

EXHIBIT B

1 Q. Ms. [REDACTED] have you ever been involved in
2 litigation?

3 A. No, I have not.

4 Q. Have you ever been charged with any crimes?

5 A. I have not, no.

6 Q. Have you ever been arrested?

7 A. No.

8 Q. You mentioned that you reviewed text threads
9 that you had with [REDACTED]

10 Are you referring to [REDACTED]?

11 A. Yes, I am.

12 Q. What text threads did you review in
13 preparation for today's deposition?

14 A. I was trying to find if she had initially told
15 me via text or in person because, for some reason, I
16 remembered reading it and I couldn't find those, and
17 then I was also just trying to remember the actual dates
18 when I sent her the, like, Instagram post that I saw.

19 Q. Other than your text messages, do you exchange
20 communications with Ms. [REDACTED] on any other platforms?

21 A. On Instagram and on text are the only
22 platforms that we use to communicate.

23 Q. When you were reorienting yourself to the
24 facts in preparation for this deposition, did you review
25 your Instagram exchanges with Ms. [REDACTED]

1 A. I did, yes.

2 Q. And did you find any Instagram exchanges you
3 had with Ms. [REDACTED] about her incident in an Uber?

4 A. I didn't, unless you're referring to me
5 sending her the actual post. We didn't really discuss
6 the incident any further than me saying I saw this, you
7 should apply.

8 MS. POWER: And just for clarity, could we put
9 up tab 2, please. We'll mark as Exhibit 1, a document
10 with the Bates stamp BW-A_R-SM-000121.

11 (Exhibit 1 marked for identification.)

12 BY MS. POWER:

13 Q. Ms. [REDACTED] is Exhibit 1 the exchange you're
14 referring to on Instagram?

15 A. Exactly, yes.

16 MS. POWER: We'll come back to this a bit
17 later, so we can take that down.

18 Q. Other than Exhibit 1, have you found any other
19 writings with Ms. [REDACTED] regarding this incident?

20 A. No, I have not.

21 Q. Do you have any documents with you during this
22 deposition?

23 A. I don't, no.

24 Q. Do you have your phone with you?

25 A. It's in the other room, but I can go and get

1 Q. Do you use it for Facebook Marketplace?

2 A. I do, yes.

3 Q. Do you have a Snapchat account?

4 A. I do not.

5 Q. Can you take a look at --

6 MS. POWER: Let's put up tab 7. We'll mark
7 this as Exhibit 3. For the record, this is the notice
8 for today's deposition.

9 (Exhibit 3 marked for identification.)

10 BY MS. POWER:

11 Q. Ms. [REDACTED] have you seen this document
12 before?

13 A. I have, yes.

14 Q. Let's turn to page 4.

15 When you received this document, did you
16 review the requests for documents labeled "Attachment
17 A"?

18 A. I did, yes.

19 Q. Have you searched for documents responsive to
20 these requests?

21 A. I have, briefly, but a lot of them, I was
22 under the impression, had already been forwarded. So
23 the Instagram DMs to [REDACTED] the texts, I couldn't find.
24 So that's why I think it would have been a conversation.
25 But other than that, I don't really have anything that